

## REMARKS/ARGUMENTS

### I. Concerning the Amendments

The amendments to independent Claims 1 and 35 are presented in order to further distinguish those claims from the cited references. Amendments relating to the viscosity of the interface layer are supported in the specification at page 8, lines 20-22. The amendments relating to web velocity are supported in the specification at page 10. The amendment to Claim 1 regarding solids content is supported by original Claim 24. Claim 24 is amended to change its dependency. The web velocity limitation of Claim 1 that was inserted into Claim 1 by a prior amendment is now removed in view of the newly presented amendment, and new Claim 42 is presented to reinstate original Claim 28. Claim 23 is cancelled as it no longer further limits Claim 1, as amended. No new matter is presented by these amendments.

### II. Concerning the Interview

The undersigned attorney thanks Examiner for taking the time to hold the interview of March 29, 2006. The interview summary record prepared by Examiner accurately describes the interview. Amendments are presented to the claims in this application consistent with the discussion of the interview.

### III. Concerning the Rejection over Prior Art

Claims 1-6, 8-27, 29-31, 34, 35 and 37 stand rejected under 35 USC 103(a) as being obvious over the combination of WO 01/54828 (hereinafter Tetra Laval) in view of Wittosch and newly cited WO 92/11095 (hereinafter Blake).

Claims 1 and 35 are the independent claims affected by this rejection. These claims are amended herein to specify that the viscosity of the interface layer is at least 100 centipoise. Claim 1 further specifies that the solids content of the multilayer curtain is at least about 40 wt.%. Claim 35 further specifies that the web velocity is at least about 200 m/min.

The Tetra Laval reference at page 4 teaches that the viscosity of the interface layer should be 50 centipoise or less. Wittosch does not employ a multilayer curtain, and thus contains no teaching regarding the viscosity of the interface layer of a multilayer curtain. Blake at page 5 teaches that the viscosity of the interface layer should be less than 1 centipoise. While Blake has comparative examples that do not use the low viscosity interface layer, those examples employ an interface layer with a viscosity of less than 100 centipoise, and the gist of Blake is that it is

disadvantageous to do so. Applicants respectively submit that the references cited in support of this rejection do not support a prima facie case of obviousness, as none of the references teach that the viscosity of the interface layer of a multilayer curtain should be at least 100 centipoise.

Regarding Claim 1, the Tetra Laval reference is silent regarding the solids content of the multilayer curtain. Wittosch does not use a multilayer curtain, and thus contains no teaching regarding the solids content of a multilayer curtain. Blake is silent as to the solids content of its curtain, and the examples of Blake are directed to low solids gelatin solution coatings.

Applicants respectfully further submit that the combination of references cited in support of this rejection does not support a prima facie case of obviousness with respect to Claim 1, as none of the references teach or suggest that the solids content of a multilayer curtain should be at least about 40 wt.%.

Applicants submit that the references do not contain any teaching which would motivate one of ordinary skill in the art to combine their teachings. To the contrary, the references contained conflicting teachings. For example, the Tetra Laval reference, at the end of page 4, teaches that the process of Wittosch, namely applying a single layer followed by a drying step followed by the application of another layer, is disadvantageous. In view of the conflicting teachings of these references, Applicants submit that the references do not suggest the invention of Claims 1 and 35 to one of ordinary skill in the art. Even if, for the sake of argument, the references could be combined, they would not suggest the claimed invention to one of ordinary skill in the art, for reasons stated hereinabove.

Claims 7 and 40 stand rejected under 35 USC 103(a) as being obvious over the combination of Tetra Laval in view of Wittosch and Blake, further in view of additional references. Applicants at this time elect, without prejudice, not to separately assert the patentability of these claims over and above the patentability of the independent claims from which they depend.

Claims 38, 39 and 41 stand rejected under 35 USC 103(a) as being obvious over the combination of Tetra Laval in view of Wittosch and Blake, further in view of Dittman. Claim 41 specifies that the multilayer curtain has a solids content of at least about 40 wt.%. The Tetra Laval reference is silent regarding the solids content of the multilayer curtain. Wittosch does not use a multilayer curtain, and thus contains no teaching regarding the solids content of a multilayer curtain. Blake is silent as to the solids content of its curtain, and the examples of Blake are directed to low solids gelatin solution coatings. Dittman discloses a bead coating process, not a multilayer curtain coating process, and the examples of Dittman are directed to

low solids gelatin-based coatings. Applicants respectfully submit that the references cited in support of this rejection do not support a prima facie case of obviousness with respect to Claim 41, as none of the references teach or suggest that the solids content of a multilayer curtain should be at least about 40 wt.%.

Applicants at this time elect, without prejudice, not to separately assert the patentability of Claims 38 and 39 over and above the patentability of the independent claims from which they depend.

#### IV. Conclusion

For the foregoing reasons, reconsideration of the claims and passing of the application to allowance are solicited.

Respectfully submitted,



Paul D. Hayhurst  
Registration No. 30,180  
Phone: 989-636-9373

P. O. Box 1967  
Midland, MI 48641-1967

PDH/ab